

IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK

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ARTHUR BALDER,

Plaintiff,

Case No. 1:22-cv-06401-JLR-SN

- against-

**NOTICE OF OPPOSITION TO
MOTION TO DISMISS IN
SUPPORT OF THIRD AMENDED
COMPLAINT**

SUSAN SARANDON,
DAVID SHARA,
HONEY SHARA,
TIGRAN TSITOGHDZIAN

Hon. Sarah Netburn, U.S.M.J.

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Plaintiff and the Exhibits attached thereto, and the accompanying Memorandum in Opposition to Motion to Dismiss in Support of Third Amended Complaint (“TAC”), at the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, Courtroom 219, New York, New York, 10007, on a date and time to be directed by the Court, for an Order quashing the Motion to Dismiss of Defendants Susan Sarandon (“Sarandon”), David Shara (“David Shara”), Honey Shara (“Honey Shara”), and Tigran Tsitoghdzian (“Tsitoghdzian”) (collectively “Defendants”) for filing under Rule 12(b)(6) of the Federal Rules of Civil Procedure knowingly without addressing the extant allegations, propounding false conclusions only by directly pretending the allegations that contradict them are not present in the TAC, thus

requesting dismissal only by means of such blatant omissions and/or denials, with prejudice, and imposing sanctions on their attorneys for abuse of process, burdening Plaintiff and the Court, and with the sole purpose to harass. The reasons and grounds for this opposition are more fully described and particularised in the accompanying Memorandum in Opposition to Motion to Dismiss and in support of this action.

Dated: On April 10, 2023

Respectfully submitted,

/s/ ARTHUR BALDER

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